

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA, \*

Plaintiff, \*

v. \* Crim. No. 2:20-cr-20148-SHL

KATRINA ROBINSON, \*

Defendant. \*

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

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COMES NOW the United States of America, by and through Joseph C. Murphy, Jr., Acting United States Attorney, and Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, and respectfully moves that this Honorable Court grant it an additional seven days to file its response to the defendant's Consolidated Motion for Judgment of Acquittal and Motion for New Trial (ECF 170) in the above-styled case. In support of this motion, the United States would show the following:

1. The defendant's Consolidated Motion was filed on October 8, 2021. By local rule, the government's response is due on October 22, 2021.

2. The defendant's Consolidated Motion is essentially two separate motions: a motion for judgment of acquittal and a motion for new trial. It is complex, and at 30 pages in length, is longer than a typical motion in a criminal case. Responding to it adequately and completely requires significant research and writing during a time period when government counsel are also

dealing with other time-sensitive matters, including matters that have accumulated while counsel have been in trial in this case.

3. It has also been necessary to order additional transcripts to prepare the government's statement of facts, and the last of those were received on October 20, 2021.

4. Finally, the undersigned had to be away from work on October 19 and 20, 2021 to deal with a family medical emergency, which has delayed the preparation of the government's response.

5. The undersigned certifies that he has consulted with Mr. Lawrence J. Laurenzi, attorney for the defendant, who does not object to this motion.

### **CONCLUSION**

For the foregoing reasons, the United States respectfully requests that the deadline for filing its response be extended by seven days, to October 29, 2021.

Respectfully submitted,

JOSEPH C. MURPHY, JR.  
Acting United States Attorney

By: /s Christopher E. Cotten  
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**CERTIFICATE OF SERVICE**

I, Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, do hereby certify that a copy of the foregoing motion has been delivered via the Court's electronic filing system, to the attorneys for the defendant.

This 21<sup>st</sup> day of October, 2021.

/s Christopher E. Cotten  
CHRISTOPHER E. COTTEN  
Assistant United States Attorney